

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNIVERSITAS EDUCATION, LLC,	)	
	)	
Petitioner/Judgment Creditor,	)	
	)	
vs.	)	Case No.: 14-FJ-05-HE
	)	
AVON CAPITAL, LLC,	)	
	)	
Respondent/Judgment Debtor,	)	
	)	
ASSET SERVICING GROUP, LLC,	)	
	)	
Respondent/Garnishee,	)	
	)	
SDM HOLDINGS, LLC,	)	
	)	
Respondent/Garnishee,	)	
	)	
and	)	
	)	
AVON CAPITAL, LLC, a Wyoming	)	
limited liability company,	)	

## **NON-CONTINUING AND GENERAL GARNISHEE'S ANSWER/AFFIDAVIT**

[illegible]

I, Kathy Kehoe, on behalf of garnishee SDM Holdings, LLC, in answer to a garnishment summons allegedly served on or around December 9, 2015, and having knowledge of the facts and being sworn state:

1. That garnishee is SDM Holdings, LLC, which was formed as a limited liability company organized under the laws of the State of Oklahoma, and the official title of the person answering on behalf of garnishee is manager.
2. At the time of the service of the garnishment summons, or upon the date it became effective, i.e., December 9, 2015, the garnishee was not indebted to the

judgment debtor, Avon Capital, LLC, which was either a Connecticut or Nevada limited liability company, for any amount of money nor did the garnishee have possession or control of any property, money, goods, chattels, credits, negotiable instruments or effects belonging to the judgment debtor or in which the judgment debtor had an interest because the employee/individual/judgment debtor was owned, in whole or in part, by such entities or otherwise indebted to them.

3. Nothing has been withheld due to a prior garnishment or continuing garnishment.
4. The garnishee makes the following claim of exemption on the part of the judgment debtor(s), or has the following objections, defenses or set-offs to judgment creditor's right to apply garnishee's indebtedness to judgment debtor upon judgment creditor's claim: SDM Holdings, LLC is neither owned by nor indebted to the actual judgment debtor(s): Avon Capital, LLC, a Connecticut limited liability company and/or Avon Capital, LLC, a Nevada limited liability company.

BY: Kathy Kehoe  
Kathy Kehoe, Manager

DATE: 2/27/2020

TITLE: Manager

Subscribed and sworn to before me on this 27 day of February, 2020.

[Signature]  
Notary Public

My commission expires: 3-31-2022

JASON J. CONCATELLI  
NOTARY PUBLIC  
MY COMMISSION EXPIRES MAR. 31, 2022

**CERTIFICATE OF SERVICE**

I hereby certify that on this \_\_\_\_ day \_\_\_\_\_, 2019, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Alan Rupe  
Gerald Green  
Melvin McVay  
Clayton Ketter  
Joshua Greenhaw